

WILENTZ, GOLDMAN & SPITZER, P.A.
Donna M. Jennings (DJ7790)
90 Woodbridge Center Drive
Post Office Box 10
Woodbridge, NJ 07095
Co-Counsel for Plaintiff WR Property LLC

STORZER & ASSOCIATES, P.C.
Sieglinde K. Rath (SR7208)
Roman Storzer, *admitted pro hac vice*
Robert L. Greene, *admitted pro hac vice*
9433 Common Brook Road, Suite 208
Owings Mills, MD 21117
Tel: (202) 857-9766
Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New
York non-profit corporation, and WR PROPERTY LLC, a
New Jersey limited liability company,

Plaintiffs,

Civil No. 3:17-cv-03226

v.

TOWNSHIP OF JACKSON, NEW JERSEY,
MICHAEL REINA, ROBERT NIXON, HELENE
SCHLEGEL, JEFFREY PURPURO, WILLIAM
CAMPBELL, and KENNETH PIESLAK,

Defendants.

**AMENDED DECLARATION OF SIEGLINDE K. RATH, ESQ.
IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT**

Sieglinde K. Rath declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am an attorney with Storzer & Associates, P.C., attorneys for the Plaintiffs, and am duly admitted to practice law in the State of New Jersey, and the United States District Court for the District of New Jersey.
2. This Declaration is based on my own personal knowledge.
3. I make this Declaration in accordance with Rule 55(a) of the Federal Rules of Civil Procedure for the purpose of obtaining entry of default against the Township of Jackson, New Jersey for failure to answer or otherwise defend as to Plaintiffs' Second Amended Complaint.
4. Pursuant to the Court's Order of March 12, 2019 (Dkt. #31), Plaintiffs filed a Second Amended Complaint on April 15, 2019, subsequently corrected on April 23, 2019. (Dkt. #40).
5. Defendant, Township of Jackson, has not filed an answer or any other responsive pleading to Plaintiffs' Second Amended Complaint, and the time to do so expired on May 14, 2019. Defendant, Township of Jackson, also has not filed an answer or any other responsive pleading to Plaintiff's First Amended Complaint (Dkt. #22).
6. Plaintiffs consented during a phone conference on June 5, 2019 with Co-counsel Donna Jennings, Esq. and Defendants' counsel, Howard Mankoff, Esq., to extend the time within which the Defendants could answer the Second Amended Complaint to June 10, 2019.
7. Defendants still failed to file an Answer by June 10, 2019.
8. The following other Defendants, whose representation status is unknown at this time, have not filed an answer or any other responsive pleading to Plaintiffs' Second Amended Complaint:

1. William Campbell in his individual capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit A.**
2. William Campbell in his official capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit B.**
3. Robert Nixon in his individual capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit C.**
4. Robert Nixon in his official capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit D.**
5. Kenneth Pieslak in his official capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit E.**
6. Jeffrey Purpuro in his individual capacity, served on May 13, 2019 and time within which to Answer or file a responsive pleading was June 3, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit F.**

7. Jeffrey Purpuro in his official capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit G.**
8. Michael Reina in his individual capacity, served on May 28, 2019 and time within which to Answer or file a responsive pleading was June 18, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit H.**
9. Michael Reina in his official capacity, served on May 7, 2019 and time within which to Answer or file a responsive pleading was May 28, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit I.**
10. Helene Schlegel in her individual capacity, served on May 8, 2019 and time within which to Answer or file a responsive pleading was May 29, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit J.**
11. Helene Schlegel in her official capacity, served on May 8, 2019 and time within which to Answer or file a responsive pleading was May 29, 2019. A true and correct copy of the Affidavit of Service reflecting same is attached hereto as **Exhibit K.**

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2019

STORZER & ASSOCIATES, P.C.

By: /s/ Sieglinde K. Rath
Sieglinde K. Rath
9344 Common Brook Road
Owings Mills, Maryland 21117
Tel: (410) 559-6325
Fax: (202) 315-3996

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on June 19, 2019, a copy of the foregoing was served on the following parties via the Court's ECF system:

Howard B. Mankoff
Marshall, Dennahey, Warner, Coleman & Goggen, PC
425 Eagle Rock Avenue
Suite 302
Roseland, New Jersey 07068
hmankoff@mdwcg.com

Pauline F. Tutelo
Marshall Dennehey, Warner, Coleman & Goggen, PC
425 Eagle Rock Avenue
Suite 302
Roseland, New Jersey 07068
pftutelo@mdwcg.com

By: /s/ Sieglinde K. Rath
Sieglinde K. Rath
Storzer & Associates, P.C.
9344 Common Brook Road, Suite 208
Owings Mills, MD 21117
Tel: (410) 559-6325
Fax: (202) 315-3996

Attorney for Plaintiffs